



**U.S. Department of Justice**  
*United States Attorney*  
*District of New Jersey*

970 Broad Street  
Newark, New Jersey 07102

973-645-2700

February 28, 2025

VIA CM/ECF

Honorable Michael E. Farbiarz  
United States District Judge  
U.S. Post Office & Federal Courthouse  
Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz  
Crim. No. 19-120 (MEF)

Dear Judge Farbiarz:

The Government respectfully submits this letter pursuant to the Court's order (ECF No. 900), reporting that, following the Defendants' request, the parties have agreed to the following modifications of the Sealed Protective Order (ECF No. 800):

1. Any attorney (regardless of whether they have filed a notice of appearance), paralegal, or staff member on the trial teams from Paul Weiss, Gibbons, Bohrer PLLC, or Jones Day, and vendors, such as e-discovery and trial graphics vendors, assisting the trial teams, may access the Restricted Information.
2. Restricted Information may be shared with (a) non-U.S. law firms engaged in connection with this matter and (b) U.S. investigators engaged in connection with this matter, so long as the partner-in-charge/investigator-in-charge of the respective entity signs an acknowledgement that: (i) they may not share the Restricted Information with any other person without notice to the Government and prior leave of Court; (ii) they have advised any recipient at their respective firms about the terms of the Sealed Protective Order; (iii) they are responsible for such persons' compliance, all subject to contempt of court.

3. Restricted Information may be shared orally (not in writing) with non-U.S. investigators engaged in connection with this matter if the investigator in charge of such entity signs a certification as described in paragraph 2.
4. Defendants' computer forensics expert Brett Harrison and his team at FTI may access the Restricted Information.

Respectfully submitted,

GLENN S. LEON  
Chief

VIKAS KHANNA  
Acting United States Attorney

*/s/ Keith D. Edelman*  
*/s/ Connor Mullin*  
*/s/ Paul G. Ream*

*/s/ Rachelle M. Navarro*

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KEITH D. EDELMAN  
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